








Our vision is ***to enable children to become lifelong learners by creating a safe and inclusive learning environment that nurtures individuality and enhances potential***

Our values:

-  ***We're imaginative*** - we're creative thinkers and doers
-  ***We're curious*** - we encourage inquisitiveness and risk taking
-  ***We're proud*** - we take pride in our school and want everyone to succeed
-  ***We're courageous*** - we understand that we learn from our mistakes
-  ***We're original*** – we celebrate difference

## **PERSONNEL RECORD KEEPING**

### **Retention of personnel records**

Personal data processed for any purpose should not be kept for longer than is necessary for that purpose or purposes.

Regular reviews should take place on any personnel records kept so schools can determine whether the information needs to be retained or safely archived or deleted.

Schools should also ensure that they process personal data in the form of employment records in accordance with data protection principles under data protection legislation.

- Personal data must be processed lawfully, fairly and in a transparent manner.
- Personal data must be collected for specified, explicit and legitimate purposes and not processed further in a manner that is incompatible with those purposes.
- Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- Personal data must be accurate and, where necessary, kept up-to-date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
- Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Personal data must be processed in a manner that ensures appropriate security of the personal data, including against unauthorised or unlawful processing, and protection against accidental loss, destruction or damage.

### **Retention periods**

Schools should have a retention schedule available to ensure that personal data is only kept for as long as is necessary and for the purpose(s) that have been stated in the privacy notices. It is recommended that the data retention schedule is published on the school's website or available within the relevant policy.

It is worth bearing in mind that privacy notices and retention policies may need to include ongoing processing of personal data and retaining it where the staff member has left the school to enable appropriate investigations to be carried out, to defend legal claims and/or comply with ongoing safeguarding obligations.

For further details on retention periods please refer to the IRMS Information Management Toolkit for Schools – <http://irms.org.uk/page/SchoolsToolkit>.

### **Access to records**

Only nominated and appropriate members of staff should have access to personnel records. They should be responsible for ensuring records are kept up-to-date and have systems in place to monitor the need to update, review or delete any data held.

Where staff have online access to update their own personal data, policies should be in place to ensure that staff update any nominated personnel for responsibility for personnel files as to any changes made.

### **Security of records**

Schools needs to ensure records are kept secure and are protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage. Adequate administrative systems should be in place, for example, the use of passwords, encryptions or locked cupboards. Any relevant policies such as ICT policies and codes of conduct should contain any responsibilities and obligations on staff and the consequences of any breach in policy.

### **Archives**

Old accounting and personnel records should be archived. The following points must be noted about archiving:

- The record need not be as accessible as current records, but must still be retrievable.
- Either adequate storage must be provided for existing records or arrangements must be made to keep them electronically or on microfilm.
- If records are archived on a system such as microfilm or optical disc, there must be adequate means for accessing and printing the record.
- Archives must be treated as being as confidential as current records.

### **Disposal of records**

When the period of retention has expired and there is no other reason to keep them, the records may be disposed of. The records should be completely destroyed.

### **Personnel files**

There will be a single central record relating to all data required by safeguarding legislation and guidance.

In addition, it is recommended that an individual personnel file should be held for each employee which includes a front sheet with the following information:

- Forename(s).
- Surname.
- Address.
- Home telephone number.

- Mobile telephone number.
- Email address.

An example of information that could be contained in the full file is given below.

### **Personal**

- Forename(s).
- Surname.
- Other names (if applicable).
- Gender.
- Ethnic origin.
- Nationality.
- Date of birth.
- Address.
- Home telephone number.
- Mobile telephone number.
- Email address.
- National insurance number.
- Driving licence number.
- Emergency contact (1) – name, relationship if any, address, home telephone number, daytime telephone number.
- Emergency contact (2) – name, relationship if any, address, home telephone number, daytime telephone number.
- DfE reference number (if applicable).
- Job-related disabilities.
- Internal procedures record unless 'spent'.
- Open references.

### **Bank details**

- Name.
- Address.
- Sort code.
- Account number.

### **Checks made**

- The Disclosure and Barring Service (DBS) deals with all vetting and barring matters. For most new appointments, an enhanced DBS check with barred list information is carried out, unless the appointee has continuous employment (a gap of no more than three months) with children and has a DBS certificate. DBS checks should only be carried out on volunteers if they are to be with children unsupervised. The associated record should take the form of a note of the DBS certificate number, when applied for, when returned and the responsible person carrying out the checks. DBS records should not be retained for more than six months.
- Prohibition order using the Employer Access Online Service – (for teachers only) to check a teacher is not prohibited from teaching.
- Qualifications – it is not always sufficient to view originals and schools should consider seriously checking with the awarding body.
- National College for School Leadership and the Teaching Agency – schools can check if a teacher has QTS, and has passed their induction.

- Identity – usually this will be photographic evidence such as a driving licence or passport. In the absence of these, the safeguarding guidance states that the birth certificate should be checked.
- Present address check/residence – the usual check would be a current household bill, but the electoral roll may also be used.
- Licence to work in the UK, if an overseas employee. European Union citizens are allowed to work in other EU countries, as are teachers of Swiss nationality.
- Medical declaration/clearance – verifying a candidate’s mental and physical fitness to carry out their work responsibilities. This includes asking relevant questions about disability and health as permitted by section 60 of the Equality Act. Alternatively, carrying out a post appointment check to help determine any necessary reasonable adjustments and to verify that the new employee is not barred on health grounds from working with children.
- Employment history and references.
- Membership of other professional bodies where claimed.
- Records of all checks should also be on a single central record, this being available to Ofsted at the time of inspection. This should also include verification checks on supply/cover staff. Where such supply staff come through an agency, the school should ask the agency for the evidence. If in doubt, do not allow the person into the school.

#### **Other details**

- Date of start of employment.
- Date deemed to have started continuous employment (this includes continuous service in other schools or local government employment).
- Reason for leaving/exit interview.
- Date of end of employment.

#### **Special categories of personal data**

This includes information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, as well as biometric/genetic data.

Processing of special categories of personal data is prohibited unless:

- The employee has given their explicit consent.
- Where it is necessary to exercise or perform any right or obligation conferred or imposed by employment law on the school.
- Where it is necessary to protect the vital interests of the employee or another person (where consent cannot be obtained).
- Where it is carried out with appropriate safeguards in the course of legitimate activities.
- Where it relates to personal data which has been manifestly made public by the employee.
- Where processing is necessary for the establishment, exercise or defence of legal claims.
- Where processing is necessary for reasons of substantial public interest.
- Where processing is necessary for the assessment of the working capacity of the employee or medical diagnoses.

#### **General note**

It is recommended that all papers relating to appointees are kept in the individual personnel files and retained while employment continues and for up to six years after employment ends. Those relating to unsuccessful applicants should be kept for a period of six months after notifying unsuccessful candidates.

The School has privacy notices in place and available to staff and candidates showing how long data their personal information will be kept.

## Reviewing

<b>Date agreed by governing board on</b>	<b>Signature of Chair or Vice Chair</b>
<b>Date agreed for review:</b>	<b>Frequency of Review</b> Annually
<b>Review Responsibility</b> Full Governing Board	